

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

KEITH RANIERE, et al.,

Defendants.

[PROPOSED]

LIMITED UNSEALING ORDER

Docket No. 18-CR-204 (S-1) (NGG)
(VMS)

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Upon the December 7, 2018 applications of Richard P. Donoghue, United States Attorney for the Eastern District of New York, by Assistant United States Attorneys Moira Kim Penza and Tanya Hajjar, for a limited unsealing order authorizing the government to disclose three partially sealed search warrants, and the affidavits filed in support of the search warrants, under Docket Numbers 18-MISC-981, 18-MISC-982, 18-MISC-1018 (hereinafter, the “WARRANTS”) to trial defendants Keith Raniere, Clare Bronfman and Nancy Salzman, respectively (hereafter, the “TRIAL DEFENDANTS”) and their respective counsel of record (hereafter, “COUNSEL OF RECORD”) in the above-captioned matter for the limited purpose of assessing whether to raise a legal challenge to the WARRANTS, and full consideration having been given to the matters set forth therein,

IT IS HEREBY ORDERED that, upon entry of this Order, a limited unsealing of the WARRANTS will become effective. On that date, the government may furnish copies of the WARRANTS to the respective COUNSEL OF RECORD. Until December 21, 2018, the WARRANTS may be reviewed only by the COUNSEL OF RECORD and may not be disseminated to or reviewed by the TRIAL DEFENDANTS or any other person.

IT IS FURTHER ORDERED that, without further order of the Court, on December 21, 2018, a further limited unsealing of the WARRANTS will become effective. On that date, COUNSEL OF RECORD may furnish copies of the WARRANTS to the TRIAL DEFENDANTS pursuant to the terms of the standing protective order in the above-captioned case to the extent those terms are not superseded by the terms in this order.

IT IS FURTHER ORDERED that the WARRANTS and any other documents filed under seal in Docket Numbers 18-MISC-981, 18-MISC-982, 18-MISC-1018 shall remain otherwise sealed to the extent they are currently, and no further disclosure of any such documents shall be made by any person, including the TRIAL DEFENDANTS and COUNSEL OF RECORD, without authorization of a judge of competent jurisdiction.

IT IS FURTHER ORDERED that, if COUNSEL OF RECORD wish to attach or describe the contents of the WARRANTS in any submission to the Court, including but not limited to any motion to suppress, such attachments and descriptions shall be filed under seal, until further order of the Court.

IT IS FURTHER ORDERED that the TRIAL DEFENDANTS and COUNSEL OF RECORD shall not remove, transfer, transmit, or travel with any of the WARRANTS in

any form, including paper and electronic, to any location outside of the United States,
without authorization of a judge of competent jurisdiction.

Dated: Brooklyn, New York
_____, 2018

The Honorable Vera M. Scanlon
United States Magistrate Judge
Eastern District of New York